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October 8, 1999

VIA FEDERAL EXPRESS

Secretary of State of New Jersey
Bureau of Business Services
225 West State Street, 3rd Floor
CN-450
Trenton, New Jersey 08608-1001

Re: **ISP Environmental Services v. Hanlin Group, et al.**
Docket No. UNN-L-4875-99
Order to Show Cause Returnable: October 22, 1999 at 9:00 a.m.

Dear Madam:

Wolff & Samson represents plaintiff ISP Environmental Services ("ISP") in the above action filed under the New Jersey Access Act, N.J.S.A. 58:10B-16, pursuant to which ISP seeks access to certain property on the Tremley Point Peninsula in Linden, New Jersey (the "Property") for remediation purposes as required by the United States Environmental Protection Agency. ISP has been advised by bankruptcy counsel for defendant the Hanlin Group, the former Property owner and parent corporation of former operator defendant LCP Chemicals, that these entities are defunct corporations who have abandoned their interest in the Property. An Order to Show Cause has been entered by the Honorable Lawrence Weiss, returnable October 22, 1999 at 9:00 a.m. at which time the defendants must show cause why an access order should not be issued by the Court.



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ISP has caused newspaper publication of the Order to Show Cause to be effected pursuant to R. 4:4-5(c). By this letter, ISP is requesting the Secretary of State notify the appropriate representatives of defendants Hanlin Group, Inc. and LCP Chemicals, Inc. of the Order to Show Cause, which is enclosed. In addition, by copy of this letter, ISP serves the Order to Show Cause upon the last known registered agent of each defendant, as well as bankruptcy counsel for the Hanlin Group.

Very truly yours,

THOMAS SABINO

TS/sf

Enclosure

cc: Lisa Bonsall, Esq. - (w/encl. - Via Federal Express)
C.A. Hansen, Jr. - (w/encl. - Via Federal Express)
Peter Tracey - (w/encl. - Via Federal Express)
Mutha Sundram, Esq. - (USEPA) - (w/encl. - Via Federal Express)

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(973) 740-0500
Attorneys for Plaintiff
ISP Environmental Services Inc.

FILED

SEP 21 1999

WILLIAM L.E. WERTHEIMER
P.J.Cv.

SEP 23 1999

SECTION

ISP Environmental Services, Inc. a
Delaware Corporation,

Plaintiff,

v.

HANLIN GROUP, INC. and LCP
CHEMICALS, INC.,

Defendants.

SUPERIOR COURT OF NEW JERSEY
LAW DIVISION: UNION COUNTY

DOCKET NO.

Civil Action

UNN-L-4875 99

ORDER TO SHOW CAUSE

THIS MATTER having been opened to the Court by Wolff & Samson, P.A., attorneys for plaintiff ISP Environmental Services, Inc. ("ISP") on an application for the issuance of an access order pursuant to N.J.S.A. 58:10B-16, and the Court having considered the Verified Complaint, the Certification of Diligent Inquiry and the Letter Brief in support of ISP's application for an access order, and the Court having determined that it is appropriate to proceed in a summary manner as authorized under N.J.S.A. 58:10B-16(a)(1), and for good cause show;

IT IS on this 21st day of September, 1999;

ORDERED that defendants Hanlin Group, Inc. and LCP Chemicals, Inc. show cause before ^{Lawrence W. B.} Honorable Judge of the Superior Court of New Jersey, Law Division, at Union County Courthouse, 2 Broad Street, Elizabeth, New Jersey, on the 22nd day of October, 1999 at 9 a.m. or as soon thereafter as practicable, why an

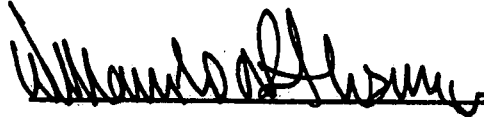
Order should not be entered pursuant to N.J.S.A. 58:10B-16 granting ISP access to the property off South Wood Avenue on the Tremley Point Peninsula, Linden, Union County, New Jersey, known as the LCP Chemicals, Inc. Superfund Site, in order to conduct a Remedial Investigation/Feasibility Study required under the May, 1999 Administrative Consent Order between the United States Environmental Protection Agency and ISP regarding the Property.

IT IS FURTHER ORDERED that this Order to Show Cause shall serve in lieu of a Summons, and that Defendants shall answer or otherwise move with respect to the Verified Complaint within 15 days after service of the Verified Complaint and this Order to Show Cause on it, exclusive of the day of serving the original of the responsive pleading upon the Court, and a copy upon Wolff & Samson, 5 Becker Farm Road, Roseland, New Jersey 07068, attorneys for ISP.

IT IS FURTHER ORDERED that service of the Verified Complaint, Letter Brief, supporting certification and this Order to Show Cause on the defendants may be made by serving a true but uncertified copy by regular mail upon the last known address of the registered agent of each defendant within two (2) days of the date hereof, as well as by publication pursuant to R. 4:4-5(c) and by further serving a copy of same upon the Secretary of State of the State of New Jersey.

IT IS FURTHER ORDERED that if the defendants intend to file an answer, affidavit, brief or other paper in opposition to ISP's application for the entry of an access order, they shall serve the papers on plaintiff's attorneys by forwarding them to the attention of Thomas Sabino, Esq., at least 15 days before the return of this Order to Show Cause, and in default thereof, the action may proceed ex parte.

IT IS FURTHER ORDERED that if plaintiff intends to file reply papers in further support of this application, it shall serve the papers on the defendants or their counsel by forwarding them at least 5 days before the return date of this Order to Show Cause.



J.S.C.

WILLIAM L'E. WERTHEIMER, P.L.C.